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May 13, 2016

VIA EMAIL & U.S. Mail

Dennis M. Toft, Esq.
Chiesa, Shahinian & Giantomasi PC
One Boland Drive
West Orange, New Jersey 07052
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**Re: BRG Harrison Lofts Urban Renewal LLC
400 South 5th St.
Harrison, New Jersey**

Dear Dennis:

As you are aware this firm represents the interests of Environmental Waste Management Associates, LLC ("EWMA") in connection to the above-referenced matter. I am writing in response to correspondence that was recently received from your office dated May 13, 2016, in which we were only just notified today that work related to the mercury contamination issue at the property would be commencing on May 23, 2016, and continuing day-to-day thereafter.

As you are aware, there was a significant amount of documentation accompanying your correspondence, which we are currently in the process of evaluating. While it is our intention to fully cooperate within the timeframe set forth in your most recent letter, in the event we are advised by our consultant that additional mercury-related testing at the property will be necessary, we are reserving the right to request a postponement of the work in order to permit our consultant enough time to perform the necessary investigation.

Further, you requested documents related to data gathered on behalf of EWMA as of your initial notice to EWMA of the mercury-related issue dated November 19, 2015. The only data collected as of the November 19, 2015 correspondence was the mercury field screening conducted by Site Remediation Group LLC ("SRG"), which was previously forwarded to your office by way of email to Robert Crespi on January 27, 2016. For your convenience the January 2016 SRG screening results are attached hereto.

With respect to your demand that EWMA pay your client \$45,000 per month for mercury-related expenses, EWMA is still investigating its potential liability in this matter and is therefore not prepared to make any payments at this time. As previously indicated, any participation in

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any investigation or remediation at the property by EWMA would be without an admission of liability and without a waiver of any rights.

Very truly yours,



Timothy E. Corrison

TEC:szp
Enclosures:

cc: Robert H. Crespi, Esq. (w/ encl.)

















